



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII

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Post-It® Fax Note	7671	Date	2/10/98	# of pages	3
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Ref: 8EPR-F

Mr. Steve Slaten
 Department of Energy
 Rocky Flats Office
 P.O. Box 928
 Golden, CO 80402-0928

Re: The Source Removal at Trench 1

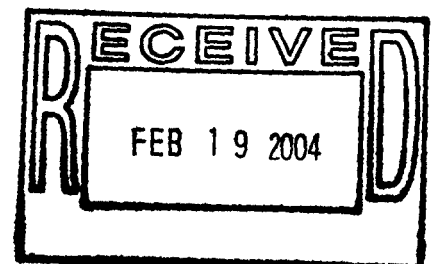
Dear Mr. Slaten:

This letter is a follow up to the meeting that was held on January 20, 1998 to discuss the status of plans for the upcoming source removal at Trench 1. A number of details were discussed and this letter will put forth EPA's position for the record.

1) Put Back Levels

At the meeting, DOE's contractor stated that "put back" levels for soils were not included in the PAM. It was proposed that the agreed upon cleanup levels, as shown in Table 3-1 of the PAM, (Tier I subsurface soils action levels), also be adopted in the document as put back levels for soils that have been removed from the excavation. It is EPA's position that excavated soils which exceed the Tier II action levels shall be shipped offsite for disposal. If it can be determined that cost savings could be achieved by shipping such soils along with similarly contaminated soils from the 903 Pad remediation, the Trench 1 soils could be temporarily stored onsite until the 903 pad soils are ready for shipment. In that event, excavated soils that are determined to fall between Tier I and Tier II levels, may be temporarily stored in containers or wrapped in an impermeable liner for temporary storage in the trench. This is consistent with the disposition of soils from the source removal actions at Trenches 3 and 4.

It should also be noted that if multiple radionuclides are detected, the sum of ratios method will be applied to calculate a total dose for comparison with the appropriately agreed upon maximum total dose (15 or 85 mrem). This would result in values that are lower than those listed in the action level framework tables.


 ADMIN RECORD
 BZ-A-000669

EPA
 Judgment for
 T1 only -
 not programmatic

1
 3

2) SAP, FIP, and HASP

According to the schedule presented at the meeting, EPA will receive the Sampling and Analysis Plan (SAP) by February 18 with the expectation of approval by March 13. EPA also formally requests that DOE submit the Field Implementation Plan (FIP) and Health and Safety Plan (HASP) at least three weeks prior to the start of excavation. These documents have been requested for previous source removals, but they have not been submitted until the start of excavation. Even though these documents are not subject to agency approval, EPA feels that it is our responsibility to review these plans and also have adequate opportunity to discuss them with DOE prior to the start of the removal action.

It was also mentioned at the meeting that the T1 FIP would be less detailed than previous FIPs, but that detailed operation orders will specify the procedures more completely and appropriately. This being the case, EPA also requests submittal of all operation orders that will be used for this action at the same time that the FIP is submitted.

3) Training Requirements for Direct Oversight of Excavation Action

Please provide to EPA, as soon as possible, the complete list of training requirements, physical capabilities, and any other conditions that must be met in order for EPA personnel to directly oversee the excavation action from inside the weather structure.

4) Project Costs

EPA requests that, upon completion of the project, the unburdened T1 project costs be submitted for the following general categories:

1. Total Project
2. Project Management
3. Planning and Site Preparation
4. Excavation and Site Restoration
5. Treatment
6. Transportation
7. Waste Disposal

If you have any comments or questions, please contact Gary Kleeman at 312-6246.

Sincerely,



Tim Rehder, Manager
Rocky Flats Project



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cc: Norma Castenada DOE
Carl Spreng, CDPHE
Jennifer Uhland, Kaiser-Em
Mark Burmeister, RMRS



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